Case 1:23-mc-00011-LJV Document 1 Filed 04/24/23



UNITED STATES OF AMERICA,

V.

23-ev-mc//

\$283,774.12 IN FUNDS SEIZED FROM ACCOUNT NUMBER 0201308971 IN THE NAME OF 5 STEMS INC. AT REGIONS FINANCIAL CORPORATION,

Defendant.

STIPULATION TO EXTEND PLAINTIFF'S TIME TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION

IT IS HEREBY STIPULATED and agreed upon between and among the United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Melanie J. Bailey, Assistant United States Attorney, of counsel, and Fonda D. Kubiak, Esq., for Larry D. Jordan, II (hereinafter "the claimant"), that pursuant to Title 18, United States Code, Section 983(a)(3)(A), the government's time to file a Verified Complaint for Forfeiture against the \$283,774.12 in funds seized from Account Number 0201308971 in the Name of 5 Stems Inc. at Regions Financial Corporation (hereinafter "subject funds") is extended from May 23, 2023 to July 24, 2023.

The parties to this Stipulation further agree that the claimant may revoke his consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the subject funds, and in that event, the government shall then have ten (10) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.

TRINI E. ROSS United States Attorney

Dated: 4/18/23

By:

MELANIE J. BAILEY Assistant United States Attorney

FONDA DAWN KUBIAK

Assistant Federal Public Defender Attorney for Larry D. Jordan II

LARRY D. JORDAN II

Claimant